EPA INSPECTION REVIEW Ed Staub and Sons Petroleum, Inc. Canyon City, Oregon 97820				
SPCC RULE REFERENCE	**PLAN**	**FIELD**	**INSPECTION DEFICIENCY DESCRIPTION (5/27/2015)**	**FACILITY FOLLOW-UP**
112.7(a)(3)(i) Plan Diagram	X	X	Plan describes physical layout of facility and includes a diagram that identifies: • Location and contents of all regulated fixed oil storage containers; • Storage areas where mobile or portable containers are located; • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt"); • Transfer stations; • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11). For each fixed container, type of oil and storage capacity. For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities. ***"Rectangular Heating Oil Tank located next to the (currently unused) office is not depicted on the facility diagram (40 CFR 112.7(a)(3)), is not listed in the plan (40 CFR 112.7(a)(3)(i), and does not have secondary containment (40 CFR 112.8(c)(2)). Oval heating oil container located next to the (currently unused) office is not listed in the plan (40 CFR 112.7(a)(3)(i), and does not have secondary containment (40 CFR 112.8(c)(2)).***"	***Violation was corrected and confirmed via email to Richard Franklin on 5/29/2015.***
112.7(c) Appropriate Containment	X	X	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), **except as provided in §112.7(k) of this section for certain qualified operational equipment.** The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. • Mobile/portable containers • Bulk storage container • Transfer areas, equipment and activities ***"The spill prediction in Table 3-1 for the tank truck unloading area is up to 2,000 gallons instantaneously released flowing to the northwest toward the stormwater catchment basin (alongside N. Washington Street) which discharges to the John Day River. The containment measure listed in the plan is a "spill kit" (SPCC plan Appendix J lists two 95-gallon and one 20-gallon spill kits) and oil/water separator. While not directly stated, it seems that it can be inferred from Table 3-1 in the***	***Violation was corrected and confirmed via email to Richard Franklin on 6/25/2015.***

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			SPCC plan that the oil/water separator has an oil retention capacity of 300 gallons. It is also not clear that a discharge from the truck unloading area would actually be captured by the oil/water separator. Therefore, the facility does not appear to have adequate capacity to contain the maximum predicted spill from the truck unloading area. The facility should either increase containment capacity or reduce the potential oil discharge volume."	
112.7(h)(1) Tank Truck Loading/ Unloading Containment	X		Tank car and tank truck loading/unloading rack is present at the facility. Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility. ***"Truck loading rack. Pad drainage is captured by the Bulk Storage Area 2 secondary containment dike to the right, but the SPCC plan did not describe how the process works. The plan only states that the truck rack containment is adequate and that there is an oil/water separator present. The plan doesn't state the capacity of the separator or where effluent discharges to. The plan should be revised to incorporate such a discussion of how the containment system operates (e.g. oil/water separator, transfer pump, etc) and include specific oil containment capacity numbers and provide containment calculations."***	**More information needed from company to resolve violation.**
112.8(b)(1)& (2) Drainage in Diked Areas		X	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge; OR • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged. If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, retained storm water is inspected and discharged per §§112.8(c)(3)(ii), (iii), and (iv) or §§112.12(c)(3)(ii), (iii), and (iv). ***"Secondary containment drain hole is open at Bulk Storage Area 3 which contains Tanks #21, #22, and #23. The drain hole must be plugged or valved to prevent uncontrolled drainage."***	***Violation was corrected and confirmed via email to Richard Franklin on 5/29/2015.***
112.8(b)(3)& (4) Drainage in Undiked Areas		X	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it t facility. Catchment basin located away from flood areas. If facility drainage not engineered as in (b)(3) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge.	**More information needed from company to resolve violation.**

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112.8(c)(2) Bulk Storage Container Containment	X	X	Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation. Diked areas sufficiently impervious to contain discharged oil. ***"Demolition debris and "out of service" bulk storage containers are stored inside Bulk Storage Area 1 secondary containment. The displacement volume of these items was not factored into available secondary containment calculations included in Appendix F of the SPCC plan. The containment calculations should be refactored, or the items should be removed from the secondary containment area."*** ***"The SPCC plan stated that the secondary containment dike for the facility's Bulk Storage Area 2 lacks adequate freeboard for precipitation with a shortfall of 2.2 inches."*** ***"Oval heating oil container located next to the (currently unused) office is not listed in the plan (40 CFR 112.7(a)(3)(i), and does not have secondary containment (40 CFR 112.8(c)(2))."*** ***"Rectangular Heating Oil Tank located next to the (currently unused) office is not depicted on the facility diagram (40 CFR 112.7(a)(3)), is not listed in the plan (40 CFR 112.7(a)(3)(i), and does not have secondary containment (40 CFR 112.8(c)(2))."*** ***"The northeast corner of the secondary containment dike for Bulk Storage Area 1 has a gap large enough for oil to leak through."***	**More information needed from company to resolve all violations. (Violations in gray are considered resolved.)**
112.8(c)(6) Integrity Testing		X	Records of all inspections and tests maintained. ***"The facility needs to provide inspector Richard Franklin with integrity testing records for the older tanks (e.g. Bulk Storage Area 1 containers)."***	***Violation was corrected and confirmed via email to Richard Franklin on 7/14/2015.***
112.8(c)(9) Effluent Treatment Facilities	X		Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b) ***"The plan discusses an oil/water separator at the truck loading rack, but does not discuss any details of its operation, including where effluent might go and how it is monitored to prevent discharges of oil. NOTE: In the field, the compliance manager explained to the inspectors that the effluent from the oil water separator is discharged into the Bulk Storage Area 2 secondary containment dike, therefore the separator***	**More information needed from company to resolve violation.**

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			cannot directly cause an off-site discharge - the field citation for 40 CFR 112.8(c)(9) is accordingly marked N/A."	
112.8(c)(10) Discharges		X	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. ***"Minor oil stains observed under piping joints and valve bodies on piping from the facility's Bulk Storage Area 2 oil containers to the truck loading rack. Sources of oil discharges must be corrected and any liquid oil cleaned up from secondary containment. Oil stains inside Bulk Storage Area 2 secondary containment dike. Liquid oil must be cleaned up, and any associated leaks from containers or piping, if found, must be corrected. Oil leaks from portable containers kept in Bulk Storage Area 3 must be corrected and cleaned up. The oil leak at the loading valve nipple on Tank #3 must be corrected. Oil leaks from oil transfer piping (originating from bulk storage containers in Bulk Storage Area 1) must be corrected. Oil leaks at dispensers located at the warehouse must be corrected and discharged oil must be cleaned up."***	***Violation was corrected and confirmed via email to Richard Franklin on 6/25/2015.***
112.8(c)(11) Mobile or Portable Containers	X	X	Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation. ***"The spill prediction in Table 3-1 in the SPCC plan for portable containers (drums and totes) stored in the warehouse is up to a maximum of 300 gallons released instantaneously to the northwest towards a stormwater catchment basin that drains to the John Day River. The secondary containment for this scenario is listed as a "spill kit" - Appendix J lists two 95-gallon and one 20-gallon spill kit, which combined together are not adequate for the maximum discharge prediction. In addition, because the facility is often unattended, the kits (classified as active measures which require a person to deploy) are not an appropriate method of containment. The facility must re-examine secondary containment for portable containers."***	**More information needed from company to resolve violation.**